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Attorneys for Plaintiff and the putative class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

THOMAS C. WILLIAMS, on behalf of
himself and those similarly situated,

Plaintiff,

vs.

THE CBE GROUP, INC.,

Defendant.

Civil Action No. **2:11-cv-3680-PS**

**DECLARATION OF
PHILIP D. STERN, ESQ.**

Philip D. Stern, of full age, by way of Declaration in lieu of Affidavit, states:

1. I am an Attorney at Law of the State of New Jersey, and the sole member of Philip D. Stern and Associates, LLC located at 697 Valley Street, Suite 2d, Maplewood, New Jersey.

2. I make this Certification in further support of preliminary approval of the class action settlement including certifying a Fed. R. Civ. P. 23(b)(3) settlement class, appointing Plaintiff's counsel as class counsel, appointing Plaintiff as the class representative and scheduling a Fairness Hearing.

3. I have personal knowledge of the following facts.

4. Based on the claims alleged in this matter, we believe that certification of a Fed. R. Civ. P. 23(b)(3) class and the proposed settlement is appropriate.

5. I have been personally involved in this matter, including the investigation of claims, drafting, reviewing and editing of pleadings and briefs, legal research, settlement negotiations and many other aspects of the litigation.

6. I have co-counseled in this matter with The Wolf Law Firm, LLC. Andrew R. Wolf, Esq. has submitted a Declaration in which he attaches certain documents concerning the proposed settlement of this action on a class basis.

7. Based on my experience, I believe that the settlement is fair, reasonable and adequate, particularly in a case alleging only statutory damages under the FDCPA.

8. I am experienced in cases involving complex litigation issues concerning the Fair Debt Collection Practices Act (FDCPA) and the complex issues related to litigating putative class action cases. I am experienced in handling complex litigation such as this, and I have been certified as class counsel in the following nine matters:

- A. Anderson v. Rubin & Rothman, LLC, Case 2:07-cv-03375 (E.D.N.Y., Hon. Sandra J. Feuerstein)
- B. Anderson v. Nationwide Credit, Inc., Case 2:08-cv-01016 (E.D.N.Y., Hon. Leonard D. Wexler)
- C. Gravina v. Client Services, Inc., Case 2:08-cv-03634, (E.D.N.Y., Hon. Leonard D. Wexler)
- D. Seraji v. Capital Management Services, LP, Case 1:09-cv-00767 (D.N.J., Hon. Douglas Arpert)
- E. Krug v. Forster, Garbus & Garbus, Case 2:08-cv-03504 (D.N.J., Hon Michael A. Shipp)
- F. Williams v. Palisades Collection, LLC, Docket BER-L-001604-11 (N.J.Super., Hon. Robert C. Wilson)
- G. Krug v. Brachfeld, Docket GLO-000419-11 (N.J.Super., Hon.Eugene J. McCaffrey, Jr.)
- H. Nicholas v. CMRE Financial Services, Inc., Docket BER-L-4336-11 (N.J.Super., John J. Langan, Jr.)
- I. Krug v. Focus Receivables Management, LLC, Docket BER-L-4337-11 (N.J.Super., John J. Langan, Jr.)

9. I am experienced with the complex issues of obtaining class certification, obtaining and verifying information related to class members, supervising and monitoring the

provision of Notice to class members. In addition, I am experienced in negotiating complex class action settlements, obtaining court approval of class action settlements and implementing, monitoring and supervising the class action settlements after preliminary approval and after final approval of class action settlements. I am a member of the National Association of Consumer Advocates and have concentrated my practice in the area of consumer law.

10. My firm, along with Mr. Wolf's firm, has devoted all resources necessary to litigate this case to date and will continue to commit the time and resources necessary until the case is finally resolved. Our combined offices have more than adequate resources to prosecute this case, including several attorneys, sufficient support staff experienced in communicating with class members, multiple telephone lines for handling communications or questions from class members, and a record of successfully completed class actions.

11. Together, our firms intend to vigorously represent the interests of the putative class. We are not aware of any possible conflicts of interest between Plaintiff and their counsel or the putative class.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: March 1, 2012

s/Philip D. Stern

Philip D. Stern